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**MEMO ENDORSED**

August 31, 2023

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**VIA ECF**

Hon. Judge Valerie E. Caproni  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 8/31/2023

Re: Perry Townsend v. The Prudential Insurance Company of America,  
U.S.D.C., S.D.N.Y. 23-CV-6429

Dear Judge Caproni:

This firm represents Plaintiff, Perry Townsend, in this action.

I write to submit this letter on behalf of Plaintiff requesting an adjournment of the initial conference currently scheduled for this matter on September 22, 2023 at 10:00 AM. Counsel for Plaintiff will be out of state and not available that date. Counsel for Defendant consents to this application.

There have been no previous requests for adjournments. We propose the following dates of availability to the court: September 15, 2023 and September 29, 2023. The parties shall continue to comply with the Court's scheduling order.

Thank you for your consideration and attention to this matter. We appreciate Your Honor's consideration of this request.

Respectfully submitted,

FRANKEL & NEWFIELD, P.C.

By: /s/ Jason A. Newfield

Jason A. Newfield

SEYFARTH SHAW, LLP

By: /s/ Nathan P. Lusignan

Nathan P. Lusignan

JAN/clm

Application GRANTED. The Initial Pretrial Conference scheduled for September 22, 2023, is hereby ADJOURNED to **Friday, September 15, 2023 at 10:00 A.M.** in Courtroom 443 of the Thurgood Marshall Courthouse, 40 Foley Square, New York, New York, 10007. The parties' joint letter in advance of the conference shall be due no later than **September 7, 2023**.

SO ORDERED.



Date: 8/31/2023

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE